

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

**CHARITY CHIDINMA
EMERONYE SWIFT,**

Plaintiff,

v.

**FRONTIER AIRLINES, INC.
(a Colorado Corporation),
and JANE DOE,**

Defendants

Civil Action No. 1:14-CV-1139

**Hon. Judge Liam O’Grady
Hon. Magistrate Judge Ivan D. Davis**

**PLAINTIFF’S OPPOSITION TO DEFENDANT’S MOTION TO DISMISS HER
COMPLAINT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 12(b)(6)**

Mrs. Charity C. Emeronye Swift (“Mrs. Swift”) asks the court to deny Defendants’ Motion to Dismiss her Complaint pursuant to Rule 12(b)(6) and to rule in her favor, because,

(a) she sufficiently alleged conduct that was outrageous and intolerable and as a result, she suffered severe mental distress; and (b) she has adequately stated a claim of defamation.

Plaintiff’s arguments in support of her opposition to Defendants’ Motion to Dismiss are set forth in the attached Memorandum of Points and Authorities.

Dated December 5, 2014.

Respectfully submitted,

/s/ Stephen Christopher Swift

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was electronically filed on December 5, 2014 using the Court's CM/ECF system with the Clerk of the Court, who will then send an electronic notice of filing to all counsel of record, including the following:

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/s/ Stephen Christopher Swift
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